

# **EXHIBIT 3**



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## STATISTICAL ANALYSIS REPORT

### AES PUERTO RICO LP, GUAYAMA, PUERTO RICO

AES Puerto Rico LP (“AES-PR”) operates a 454 MW coal-fired power plant located in the municipality of Guayama in the south coast of Puerto Rico (See Figure 1). The power plant uses bituminous coal for energy production, and generates coal combustion residuals (CCR) that are converted to a manufactured aggregate known as Agremax. The manufactured aggregate is stored in a temporary Agremax stockpile storage area that is located near the southern property boundary.

On April 17, 2015, the United States Environmental Protection Agency (USEPA) published the final rule that establishes national minimum criteria for existing CCR landfills, surface impoundments, and lateral extensions of those units (the “CCR Rule”).<sup>1</sup> The CCR Rule establishes a multi-phase approach for the monitoring of groundwater and provides the criteria for groundwater sampling and analysis, confirmation of the source (or sources of impacts found) and whether any further assessment monitoring or corrective measures are warranted. See 40 CFR Parts 257.90 through 257.98. As an initial step, the CCR Rule requires that a groundwater-monitoring program be developed and implemented – starting with a “detection-monitoring phase.” By implementing this program phase, groundwater-sampling data are collected from background monitoring wells to establish background concentration levels for constituents listed in the CCR Rule. See 40 CFR Appendix III to Part 257 – Constituents for Detection Monitoring, and 40 CFR Appendix IV to Part 257 – Constituents for Assessment Monitoring. Groundwater data are also collected from compliance monitoring wells for analysis of the same constituents and the results are compared to the background data using a statistical analysis approach.

The Statistical Analysis Report describes the procedures and findings of statistical evaluation performed on the analytical results generated from eight groundwater-monitoring events. These sampling events were completed by October 17, 2017 as part of the initial phase of detection monitoring.

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<sup>1</sup> The AESPR temporary storage of its inventory of manufactured aggregate (or Agremax) is not a CCR unit subject to the CCR Rule. Nonetheless, as a conservative measure, AESPR has taken steps to satisfy the CCR Rule and has voluntarily prepared and published certain documents including the 2017 Annual Groundwater Monitoring Report. The undertaking of these steps shall not be interpreted or construed in any way as an admission that AESPR’s operations or facility are subject to or covered by the CCR Rule, and AESPR expressly reserves any rights and defenses available to it in connection with this and any related matters.

Sampling and analysis were performed in accordance with the procedures described in the document entitled *Groundwater Monitoring System & Sampling and Analysis Program, AES Puerto Rico LP, Guayama, Puerto Rico* prepared by DNA-Environment LLC and dated August 2017 (the “Groundwater Monitoring Plan”). All groundwater and quality control samples were shipped via overnight carrier to TestAmerica Inc. (Pensacola, FL) to be analyzed for the list of constituents in Appendix III and Appendix IV. Samples were shipped following chain of custody protocols.

The TestAmerica’s laboratory reports certified by a Puerto Rico Licensed Chemist are the datasets used for statistical evaluation pertaining to the initial phase of detection monitoring.

Selection of appropriate and representative background data was conducted in accordance with the CCR Rule. The design, construction, installation and rationale for the placement of background and compliance monitoring wells are described in detail in the Groundwater Monitoring Plan and summarized in **Table 1**. The locations of the background (“upgradient”) and compliance wells (“downgradient”) are shown in **Figure 2**.

### ***Statistical Evaluation***

Statistical evaluation was performed following the procedures described in the Groundwater Monitoring Plan. The statistical methods employed are in accordance with the CCR Rule and USEPA guidance document entitled *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities – Unified Guidance* (USEPA 2009).

Graphical displays and statistical tests were performed using the Sanitas™ Statistical Software (Sanitas Technologies, Alamosa, CO). The ProUCL statistical program (USEPA 2013) was used to complement the analyses performed with the *Sanitas™* software.

The datasets for background and compliance wells were examined using various graphical displays and statistical testing procedures in order to identify the underlying sampling distribution and prepare the data for further statistical analysis. Statistical evaluation of the constituents listed in Appendix III (See **Table 2**) was performed by comparing each constituent/compliance-well pair to the corresponding constituent background value determined from observed concentrations in upgradient monitoring wells (i.e., interwell statistical comparisons).

### **Evaluation of Background Levels**

Given that two monitoring wells (MW-1 and MW-2) were available to compute background values for CCR Rule constituents, the datasets from these wells were compared to determine if the observed values could be combined so as to obtain one dataset representing a site-wide background level for each constituent. In order to combine values from background wells, the statistical assumption that observed values are drawn from the same underlying population must be met. Therefore, the sampling distribution of background values for each constituent should not exhibit spatial variability between background wells. Generally, the constituents

listed in Appendix III tend to be sensitive to localized geochemistry and therefore often reflect spatial variability among background monitoring wells.

Among others, the following procedures were performed on the background datasets obtained from MW-1 and MW-2 in order to identify or test for the following:

- Outlier values -

Side-by-side box plots of background data were constructed for each constituent/well pair to visually identify if outliers were present in the datasets from MW-1 and MW-2. The Dixon statistical test and/or Tukey's Outlier Screening test were performed to further confirm the presence or absence of outlier values in the background datasets.

- Temporal trends –

The Mann-Kendall statistical test was performed to identify if temporal trends were present in the background datasets.

- Normality or other distribution –

Goodness-of-fit (GOF) tests were conducted to evaluate the underlying population distribution of the data (i.e., normal, lognormal, gamma, or other). The Shapiro-Wilks method was performed to test for normality. Whenever possible, data was transformed to normal using the "ladder of powers" (See below).

- Equality of variance –

The Levene's Equality of Variance method was performed to test for variance homogeneity between the MW-1 and MW-2 datasets.

The datasets for background and compliance wells were handled as follows:

- Performing parametric or nonparametric statistical methods -

Whenever possible, non-normally distributed data were transformed to normally distributed data using the "ladder of powers" (i.e.,  $x^{1/2}$ ,  $x^2$ ,  $x^{1/3}$ ,  $x^3$ , etc.). Subsequent statistical evaluation of constituents in Appendix III was analyzed using the appropriate parametric test (for normally distributed or normally-transformed data). Otherwise, the corresponding nonparametric test was performed.

#### Evaluation of Appendix III Constituents for Detection Monitoring

Analytical results for the constituents listed in Appendix III were statistically evaluated using the prediction interval method. The prediction interval procedure has been indicated by the USEPA as a valid statistical method under 40 CFR Part 257.93(f) (1) through (5). Background levels for each constituent listed in Appendix III were computed as upper prediction limits (UPL),

considering one future observation and a 95% confidence coefficient. For each constituent, the individual concentration from each monitoring event and compliance well was compared to the corresponding background UPL to determine if a statistically significant increase (SSI) over background could be identified.

Given that the observed values in background wells MW-1 and MW-2 exhibited spatial variability of Appendix III constituents (as determined from the statistical evaluation discussed above), separate UPL values for background were calculated. Statistical results for the constituents listed in Appendix III are presented in **Attachment A**, where individual observations from each compliance well (MW-3, MW-4 and MW-5) were compared against the corresponding UPL value. The included graphs show comparisons between compliance wells and the UPL value computed from background well MW-1. However, statistical evaluations were also performed by computing the UPL value from background well MW-2, and from the combined data from MW-1 and MW-2. The three tables in **Attachment A** correspond to UPL values computed from MW-1, MW-2, and combined observations (MW-1 and MW-2), respectively. Compliance wells exhibiting a SSI from the background UPL are listed in the top left corner of the included graphs and shown in bold phase in the summary tables.

Per provisions in the CCR Rule, an evaluation of potential alternate sources for the observed statistical results is presently being conducted as provided by the CCR Rule, including considerations of the Site's location near the shoreline and in the vicinity of adjacent and nearby industrial sites undergoing cleanup under USEPA direction. See **Figure 1**.

The CCR Rule does not require statistical analysis for the Appendix IV list of constituents at the detection monitoring evaluation stage. The statistical procedures during assessment monitoring ultimately require comparison of compliance well data to a Groundwater Protection Standard (GWPS). Said analysis often requires additional sampling and statistical analysis efforts.

## REFERENCES

DNA-Environment, LLC. August 2017. *Groundwater Monitoring System & Sampling and Analysis Program, AES Puerto Rico LP, Guayama, Puerto Rico*

USEPA (United States Environmental Protection Agency). 2009. *Statistical Analysis of Ground-Water Monitoring Data at RCRA Facilities, Unified Guidance*. Washington, DC: EPA. EPA 530/R-09-007.

USEPA (United States Environmental Protection Agency). 2013. *ProUCL 5.0 Software and User Guide*. <http://www.epa.gov/osp/hstl/tsc/software.htm>.

## **TABLES**

**Table 1.** Design, Construction and Installation of Monitoring Wells

Well ID	Well Placement	Coordinates <sup>1</sup>	TOC <sup>2</sup> Elevation (ft)	Screen Interval (ft bgs <sup>3</sup> )	Well Diameter/ Screen Slot Size	Rationale for Placement
MW-1	Upgradient	212731.35	230013.63	22.90	12.9 – 22.9 2-in PVC/ 0.010-in	Located to the north of the Agremax Storage Area to obtain representative samples of background groundwater in the uppermost aquifer not impacted by potential migration from the Agremax stockpile.
MW-2	Upgradient	212639.32	230127.80	23.10	9.9 – 19.9 2-in PVC/ 0.010-in	Located to the northeast of the Agremax Storage Area to monitor the quality of groundwater, in the uppermost aquifer, migrating towards the Agremax Storage Area and potentially impacted by existing contamination from the Chevron Phillips Chemical Puerto Rico Core facility, adjoining property to the east.
MW-3	Downgradient	212188.69	229867.35	16.04	13.8 – 23.8 2-in PVC/ 0.010-in	Located to the south-southwest of the Agremax Storage Area and stormwater control system. This well was installed in the uppermost aquifer to detect potential impacts to the quality of groundwater passing the downgradient boundary of the Agremax Storage Area and stormwater control system, in the south-southwest direction.
MW-4	Downgradient	212186.07	229968.59	17.85	15 – 25 2-in PVC/ 0.010-in	Located to the south of the Agremax Storage Area and contiguous stormwater concrete ditch. This well was installed in the uppermost aquifer to detect potential impacts to the quality of groundwater passing the downgradient boundary of the Agremax Storage Area, southward.
MW-5	Downgradient	212202.55	230090.65	16.47	13.4 – 23.4 2-in PVC/ 0.010-in	Located to the south-southeast of the Agremax Storage Area and contiguous stormwater concrete ditch. This well was installed in the uppermost aquifer to detect potential impacts to the quality of groundwater passing the downgradient boundary of the Agremax Storage Area, in the south-southeast direction.

Notes: <sup>1</sup> Puerto Rico State Plane Coordinate System, NAD 83, Lambert Projection (meters)<sup>2</sup> TOC – Top of Casing<sup>3</sup> bgs – below ground surface

**Table 2.** Constituents for Detection Monitoring Under the CCR Rule

Constituent	MCL (mg/L)
<b>Appendix III to Part 257 – Constituents for Detection Monitoring</b>	
Boron	--
Calcium	--
Chloride	--
Fluoride	4.0
pH	--
Sulfate	--
Total Dissolved Solids (TDS)	--

Notes: MCL - Maximum Contaminant Level, USEPA National Primary Drinking Water Regulations

mg/L - Milligram per Liter

-- - Indicates that the constituent does not have an established MCL value.

## **FIGURES**

Figure 1

Site Location Map  
AES Puerto Rico, LP  
Guayama, Puerto Rico

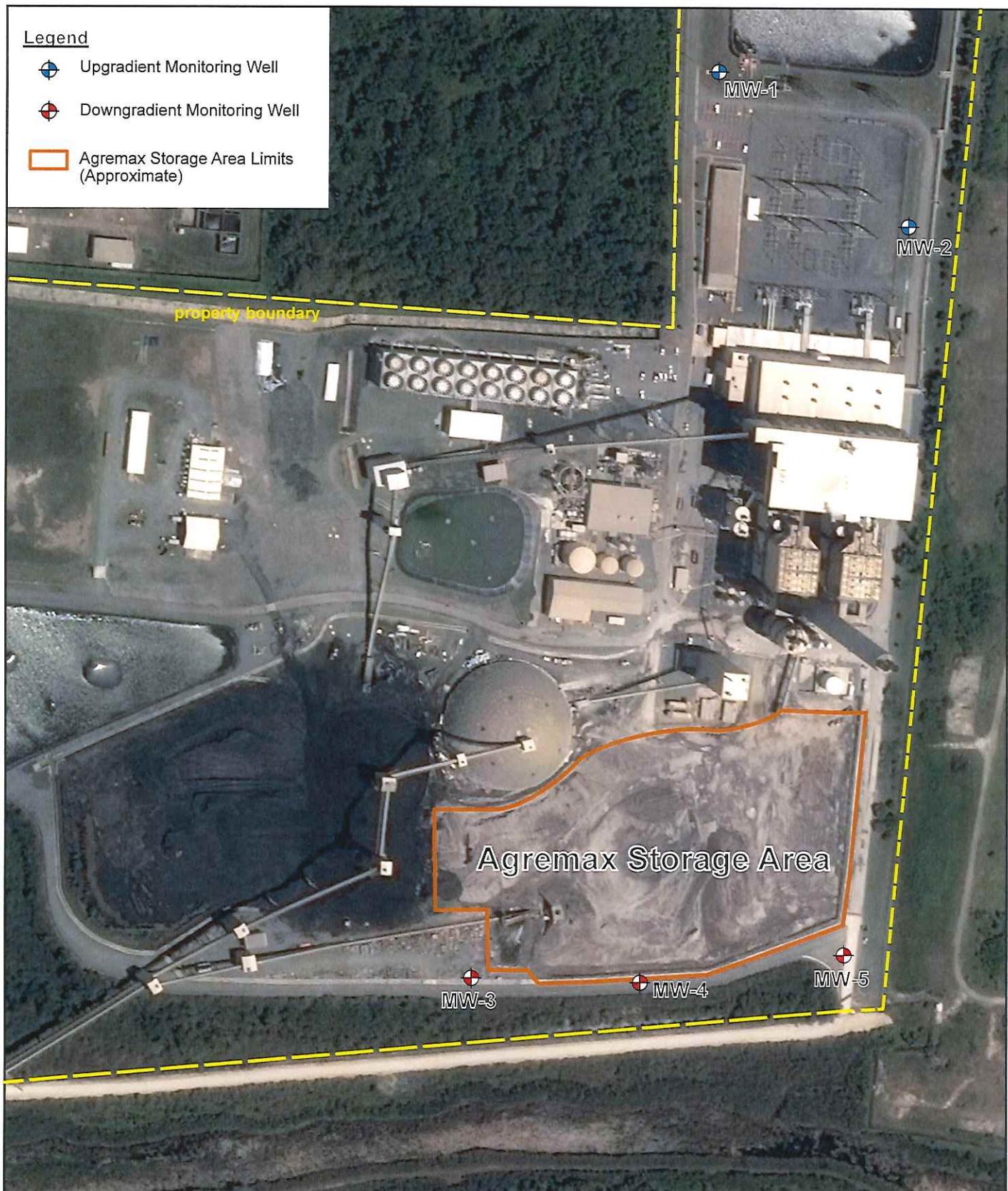
Legend

AES Puerto Rico  
Approximate Property Boundary

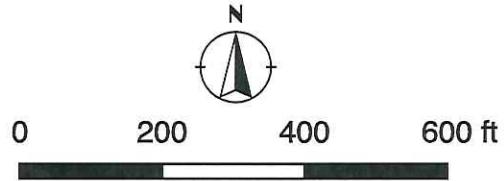


0 250 500 750 1000 1250 ft





**Figure 2**  
Groundwater Monitoring System  
AES Puerto Rico, LP  
Guayama, Puerto Rico



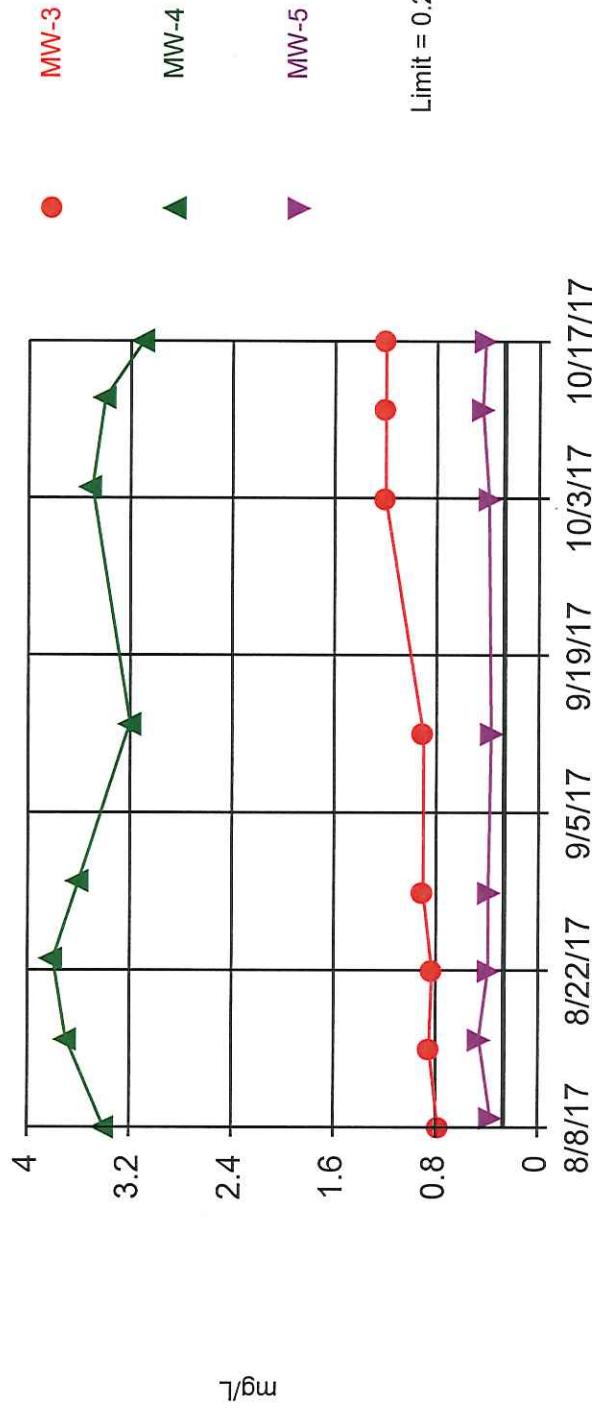
**ATTACHMENT A**

*STATISTICAL RESULTS FOR CONSTITUENTS LISTED IN APPENDIX III TO PART 257*

### Exceeds Limit: MW-3, MW-4, MW-5

### Prediction Limit

#### Interwell Non-parametric

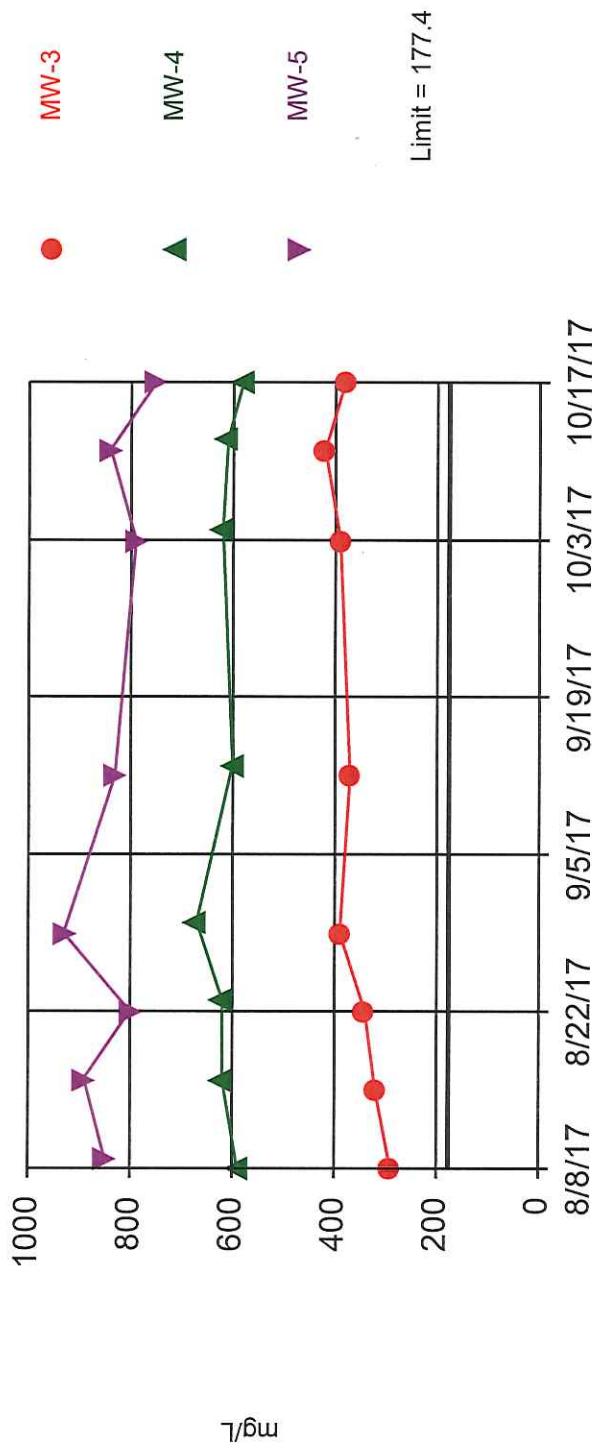


Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.1 alpha level. Limit is highest of 8 background values. Annual per-constituent alpha = 0.1077. Individual comparison alpha = 0.01882 (1 of 2). Comparing 3 points to limit. Insufficient data to test for seasonality; data will not be deseasonalized.

Constituent: Boron      Analysis Run 1/12/2018 9:31 AM  
AES Puerto Rico      Client: AES Puerto Rico, LP      Data: 2017\_DMP\_AES

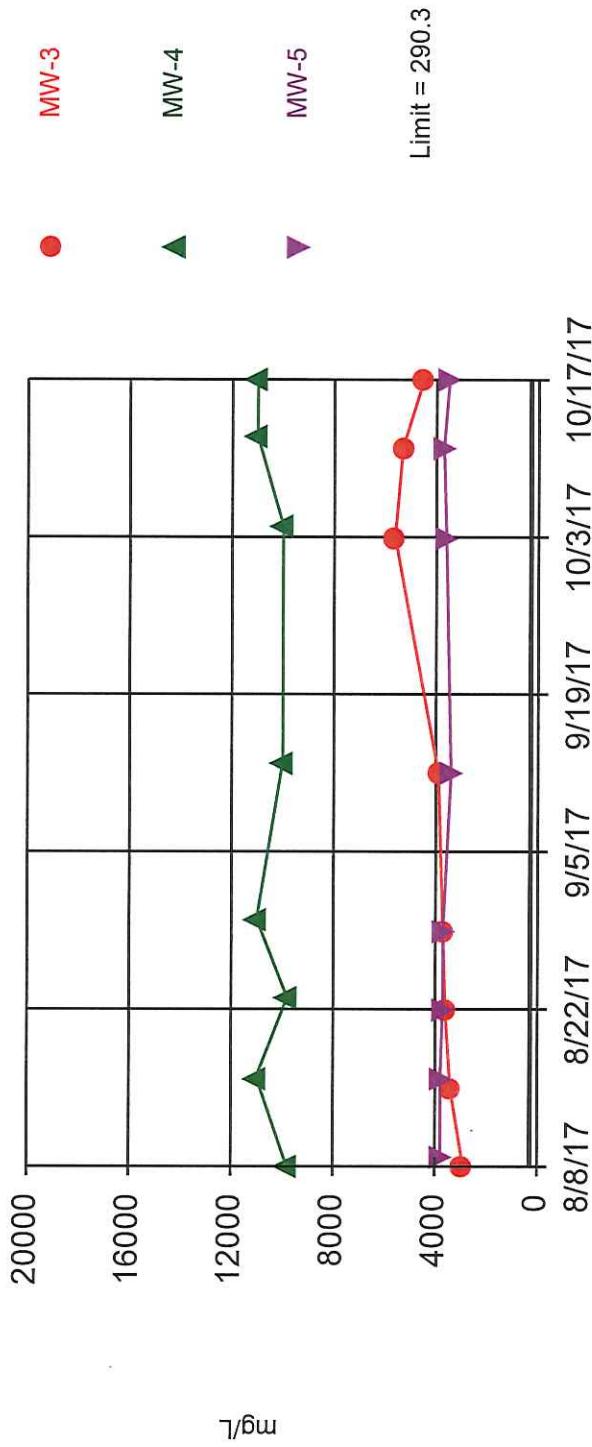
Exceeds Limit: MW-3, MW-4, MW-5

Prediction Limit  
Interwell Parametric



Exceeds Limit: MW-3, MW-4, MW-5

Prediction Limit  
Interwell Parametric

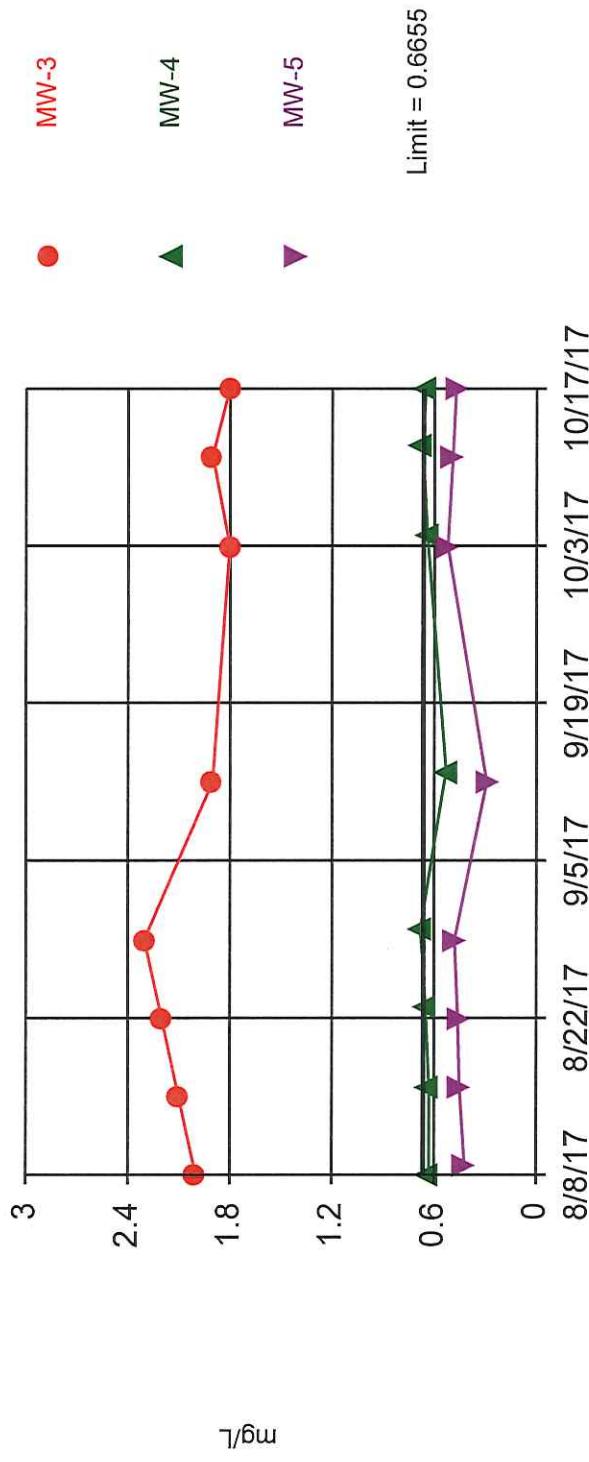


Background Data Summary: Mean=241.3, Std. Dev.=20.31, n=8. Insufficient data to test for seasonality; not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.1, calculated = 0.8619, critical = 0.851. Kappa = 2.416 (c=7, w=3, 1 of 2, event alpha = 0.05132). Report alpha = 0.007498. Individual comparison alpha = 0.002505. Comparing 3 points to limit.

Constituent: Chloride Analysis Run 1/12/2018 9:31 AM  
AES Puerto Rico Client: AES Puerto Rico, LP Data: 2017\_DMP\_AES

Exceeds Limit: MW-3

Prediction Limit  
Interwell Parametric

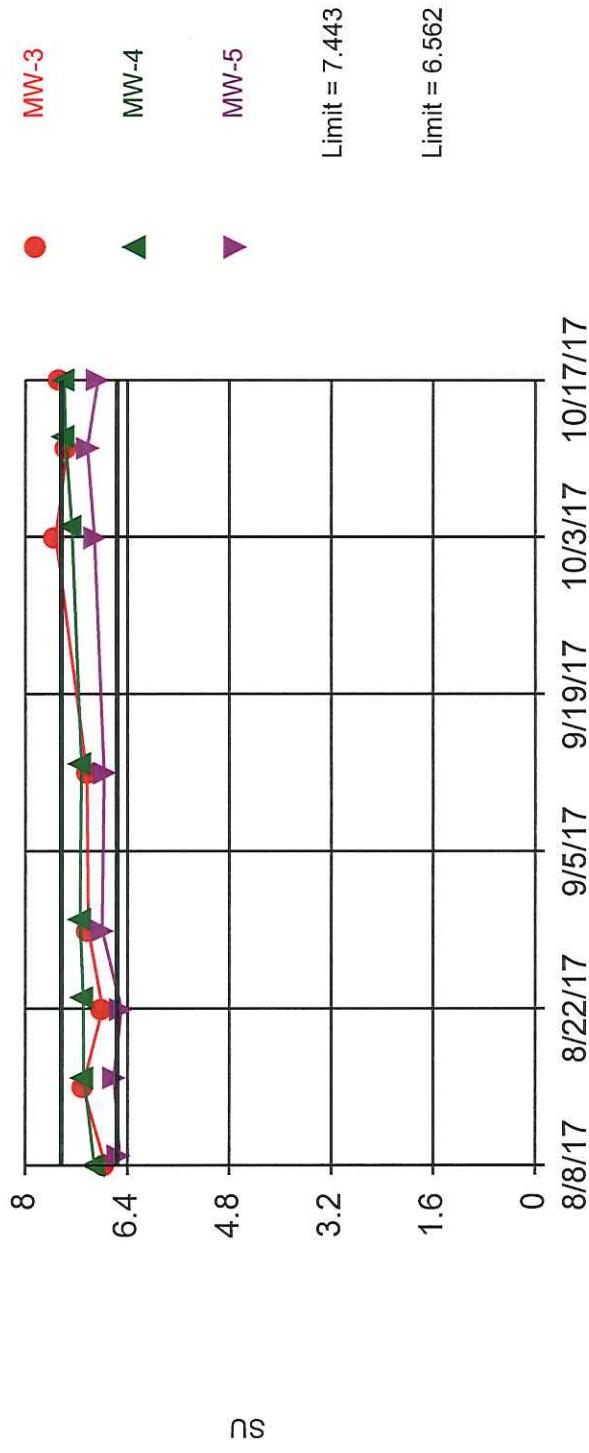


Background Data Summary: Mean=0.5425, Std. Dev.=0.05092, n=8. Insufficient data to test for seasonality; not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.1, calculated = 0.9062, critical = 0.851. Kappa = 2.416 (c=7, w=3, 1 of 2, event alpha = 0.05132). Report alpha = 0.007498. Individual comparison alpha = 0.002505. Comparing 3 points to limit.

Constituent: Fluoride Analysis Run 1/12/2018 9:31 AM  
AES Puerto Rico Client: AES Puerto Rico, LP Data: 2017\_DMP\_AES

### Exceeds Limits: MW-3

### Prediction Limit Interwell Parametric



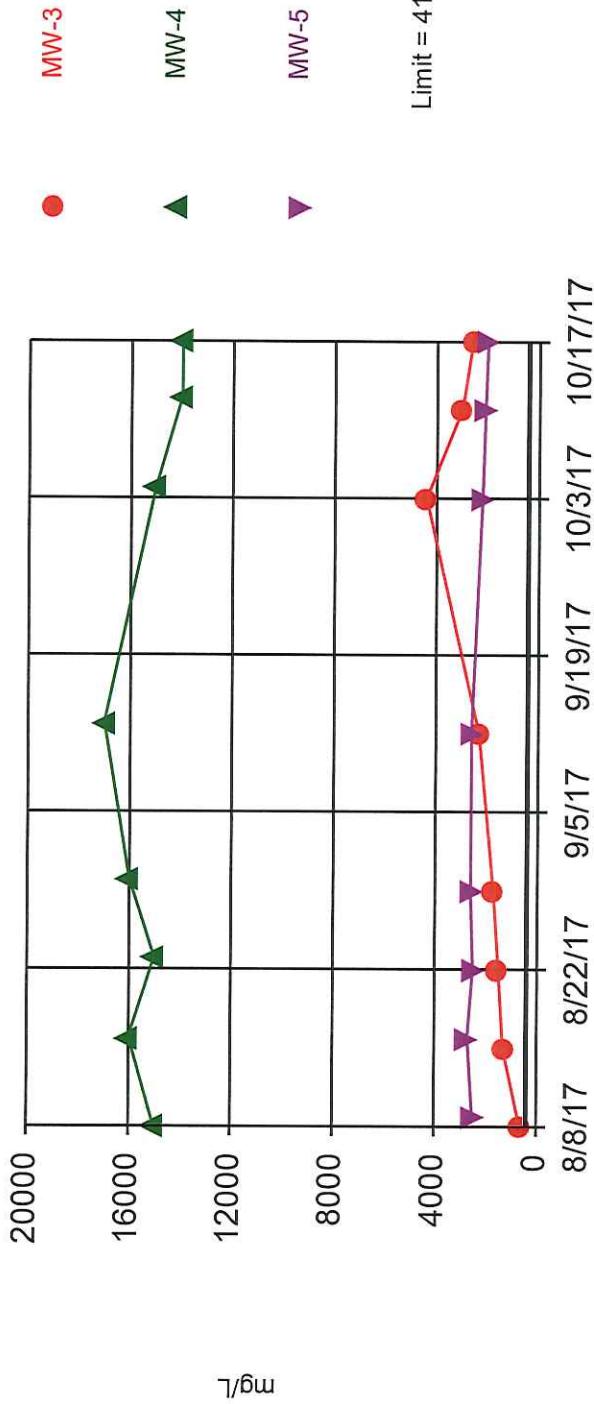
Background Data Summary: Mean=7.003, Std. Dev.=0.1825, n=8. Insufficient data to test for seasonality; not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.1, calculated = 0.974, critical = 0.851. Kappa = 2.416 (c=7, w=3, 1 of 2, event alpha = 0.05132). Report alpha = 0.007498. Individual comparison alpha = 0.001253. Comparing 3 points to limit.

Constituent: pH Analysis Run 1/12/2018 9:31 AM  
AES Puerto Rico Client: AES Puerto Rico, LP Data: 2017\_DMP\_AES

Exceeds Limit: MW-3, MW-4, MW-5

Prediction Limit

Interwell Non-parametric

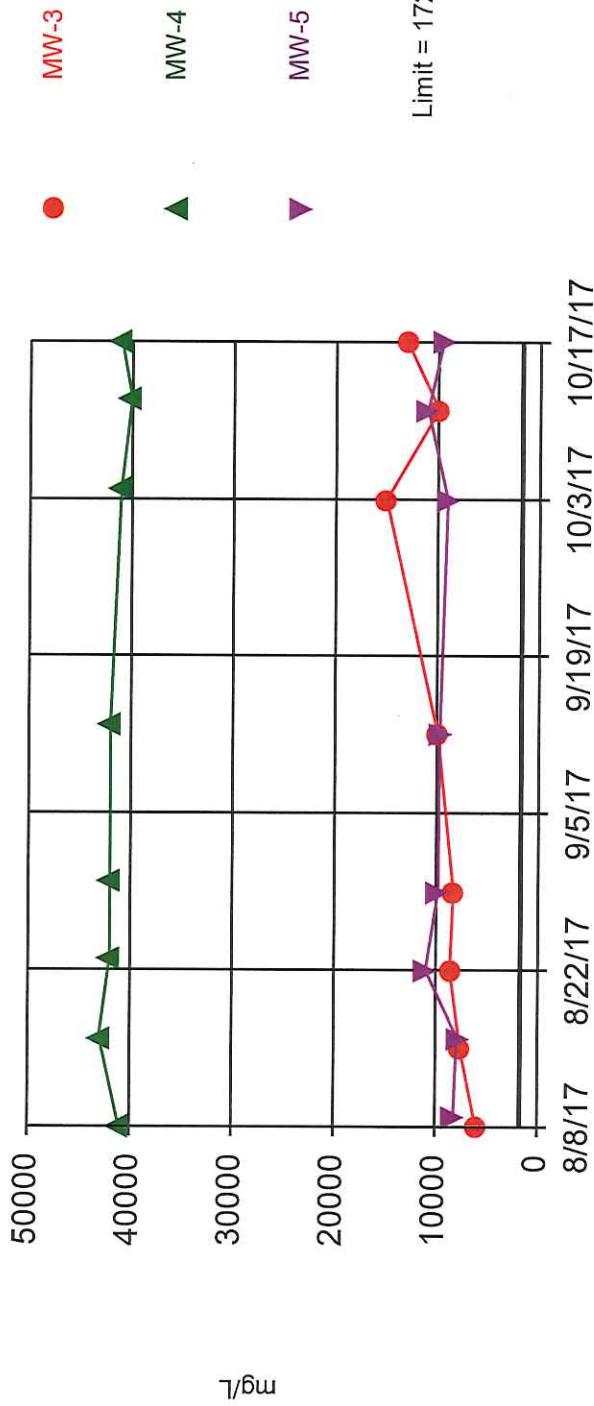


Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.1 alpha level. Limit is highest of 8 background values. Annual per-constituent alpha = 0.1077. Individual comparison alpha = 0.01882 (1 of 2). Comparing 3 points to limit. Insufficient data to test for seasonality; data will not be deseasonalized.

Constituent: Sulfate Analysis Run 1/12/2018 9:31 AM  
AES Puerto Rico Client: AES Puerto Rico, LP Data: 2017\_DMP\_AES

Exceeds Limit: MW-3, MW-4, MW-5

### Prediction Limit Interwell Parametric



Background Data Summary (based on square transformation): Mean=2013750, Std. Dev.=390528, n=8. Insufficient data to test for seasonality; not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.1, calculated = 0.862, critical = 0.851. Kappa = 2.416 (c=7, w=3, 1 of 2, event alpha = 0.05132). Report alpha = 0.007498. Individual comparison alpha = 0.002505. Comparing 3 points to limit.

Constituent: Total Dissolved Solids    Analysis Run 1/12/2018 9:31 AM  
AES Puerto Rico    Client: AES Puerto Rico, LP    Data: 2017\_DMP\_AES

## Prediction Limit

Constituent	Well	AES Puerto Rico	Client: AES Puerto Rico, LP	Data: 2017_DMP_AES	Printed 1/12/2018, 1:34 PM						
		Upper Lim..	Lower Lim..	Date	Obsrv.	Sig.	Bq N	%NDS	Transform	Alpha	Method
Boron (mg/L)	MW-3	0.27	n/a	10/17/2017	1.2	Yes	8	0	n/a	0.01882	NP Inter (normality) ...
Boron (mg/L)	MW-4	0.27	n/a	10/17/2017	3.1	Yes	8	0	n/a	0.01882	NP Inter (normality) ...
Boron (mg/L)	MW-5	0.27	n/a	10/17/2017	0.42	Yes	8	0	n/a	0.01882	NP Inter (normality) ...
Calcium (mg/L)	MW-3	177.4	n/a	10/17/2017	380	Yes	8	0	No	0.002505	Param Inter 1 of 2
Calcium (mg/L)	MW-4	177.4	n/a	10/17/2017	580	Yes	8	0	No	0.002505	Param Inter 1 of 2
Calcium (mg/L)	MW-5	177.4	n/a	10/17/2017	750	Yes	8	0	No	0.002505	Param Inter 1 of 2
Chloride (mg/L)	MW-3	290.3	n/a	10/17/2017	4500	Yes	8	0	No	0.002505	Param Inter 1 of 2
Chloride (mg/L)	MW-4	290.3	n/a	10/17/2017	11000	Yes	8	0	No	0.002505	Param Inter 1 of 2
Chloride (mg/L)	MW-5	290.3	n/a	10/17/2017	3500	Yes	8	0	No	0.002505	Param Inter 1 of 2
Fluoride (mg/L)	MW-3	0.6655	n/a	10/17/2017	1.8	Yes	8	0	No	0.002505	Param Inter 1 of 2
Fluoride (mg/L)	MW-4	0.6655	n/a	10/17/2017	0.65	No	8	0	No	0.002505	Param Inter 1 of 2
Fluoride (mg/L)	MW-5	0.6655	n/a	10/17/2017	0.47	No	8	0	No	0.002505	Param Inter 1 of 2
pH (SU)	MW-3	7.443	6.562	10/17/2017	7.45	Yes	8	0	No	0.001253	Param Inter 1 of 2
pH (SU)	MW-4	7.443	6.562	10/17/2017	7.39	No	8	0	No	0.001253	Param Inter 1 of 2
pH (SU)	MW-5	7.443	6.562	10/17/2017	6.86	No	8	0	No	0.001253	Param Inter 1 of 2
Sulfate (mg/L)	MW-3	410	n/a	10/17/2017	2600	Yes	8	0	n/a	0.01882	NP Inter (normality) ...
Sulfate (mg/L)	MW-4	410	n/a	10/17/2017	14000	Yes	8	0	n/a	0.01882	NP Inter (normality) ...
Sulfate (mg/L)	MW-5	410	n/a	10/17/2017	2000	Yes	8	0	n/a	0.01882	NP Inter (normality) ...
Total Dissolved Solids (mg/L)	MW-3	1720	n/a	10/17/2017	13000	Yes	8	0	x^2	0.002505	Param Inter 1 of 2
Total Dissolved Solids (mg/L)	MW-4	1720	n/a	10/17/2017	41000	Yes	8	0	x^2	0.002505	Param Inter 1 of 2
Total Dissolved Solids (mg/L)	MW-5	1720	n/a	10/17/2017	9500	Yes	8	0	x^2	0.002505	Param Inter 1 of 2

Note: Prediction Limits based on observations  
from Background Well MW-1

## Prediction Limit

Constituent	Well	AES Puerto Rico	Client: AES Puerto Rico, LP	Data: 2017_DMP_AES	Printed 1/12/2018, 5:43 PM					
		Upper Lim.	Lower Lim.	Date	Sig.	Bg N	%NDs	Transform	Alpha	Method
Boron (mg/L)	MW-3	0.117	n/a	10/17/2017	1.2	Yes	8	0	n/a	0.01882
Boron (mg/L)	MW-4	0.117	n/a	10/17/2017	3.1	Yes	8	0	n/a	0.01882
Boron (mg/L)	MW-5	0.117	n/a	10/17/2017	0.42	Yes	8	0	n/a	0.01882
Calcium (mg/L)	MW-3	106.1	n/a	10/17/2017	380	Yes	8	0	No	0.002505
Calcium (mg/L)	MW-4	106.1	n/a	10/17/2017	580	Yes	8	0	No	0.002505
Calcium (mg/L)	MW-5	106.1	n/a	10/17/2017	750	Yes	8	0	No	0.002505
Chloride (mg/L)	MW-3	45	n/a	10/17/2017	4500	Yes	8	0	n/a	0.01882
Chloride (mg/L)	MW-4	45	n/a	10/17/2017	11000	Yes	8	0	n/a	0.01882
Chloride (mg/L)	MW-5	45	n/a	10/17/2017	3500	Yes	8	0	n/a	0.01882
Fluoride (mg/L)	MW-3	0.4648	n/a	10/17/2017	1.8	Yes	8	0	No	0.002505
Fluoride (mg/L)	MW-4	0.4648	n/a	10/17/2017	0.65	Yes	8	0	No	0.002505
Fluoride (mg/L)	MW-5	0.4648	n/a	10/17/2017	0.47	Yes	8	0	No	0.002505
pH (SU)	MW-3	7.282	6.443	10/17/2017	7.45	Yes	16	0	No	0.001253
pH (SU)	MW-4	7.282	6.443	10/17/2017	7.39	Yes	16	0	No	0.001253
pH (SU)	MW-5	7.282	6.443	10/17/2017	6.86	No	16	0	No	0.001253
Sulfate (mg/L)	MW-3	31.79	n/a	10/17/2017	2600	Yes	8	0	sqr(x)	0.002505
Sulfate (mg/L)	MW-4	31.79	n/a	10/17/2017	14000	Yes	8	0	sqr(x)	0.002505
Sulfate (mg/L)	MW-5	31.79	n/a	10/17/2017	2000	Yes	8	0	sqr(x)	0.002505
Total Dissolved Solids (mg/L)	MW-3	570.9	n/a	10/17/2017	13000	Yes	8	0	No	0.002505
Total Dissolved Solids (mg/L)	MW-4	570.9	n/a	10/17/2017	41000	Yes	8	0	No	0.002505
Total Dissolved Solids (mg/L)	MW-5	570.9	n/a	10/17/2017	9500	Yes	8	0	No	0.002505

Note: Prediction Limits based on observations  
from Background Well MW-2

## Prediction Limit

Constituent	AES Puerto Rico	Client: AES Puerto Rico, LP	Data: 2017_DMP_AES	Data: 2017_AES	Printed 1/12/2018, 5:20 PM					
Well	Upper Lim.	Lower Lim.	Date	Obsrv.	Sig.	Bq_N	%NDs	Transform	Alpha	Method
MW-3	0.27	n/a	10/17/2017	1.2	Yes	16	0	n/a	0.008129	NP Inter (normality) ...
MW-4	0.27	n/a	10/17/2017	3.1	Yes	16	0	n/a	0.008129	NP Inter (normality) ...
MW-5	0.27	n/a	10/17/2017	0.42	Yes	16	0	n/a	0.008129	NP Inter (normality) ...
MW-3	170	n/a	10/17/2017	380	Yes	16	0	n/a	0.008129	NP Inter (normality) ...
MW-4	170	n/a	10/17/2017	580	Yes	16	0	n/a	0.008129	NP Inter (normality) ...
MW-5	170	n/a	10/17/2017	750	Yes	16	0	n/a	0.008129	NP Inter (normality) ...
MW-3	270	n/a	10/17/2017	4500	Yes	16	0	n/a	0.008129	NP Inter (normality) ...
MW-4	270	n/a	10/17/2017	11000	Yes	16	0	n/a	0.008129	NP Inter (normality) ...
MW-5	270	n/a	10/17/2017	3500	Yes	16	0	n/a	0.008129	NP Inter (normality) ...
MW-3	7.282	6.443	10/17/2017	7.45	Yes	16	0	No	0.001253	Param Inter 1 of 2
MW-4	7.282	6.443	10/17/2017	7.39	Yes	16	0	No	0.001253	Param Inter 1 of 2
MW-5	7.282	6.443	10/17/2017	6.86	No	16	0	No	0.001253	Param Inter 1 of 2
MW-3	0.6393	n/a	10/17/2017	1.8	Yes	16	0	No	0.002505	Param Inter 1 of 2
MW-4	0.6393	n/a	10/17/2017	0.65	Yes	16	0	No	0.002505	Param Inter 1 of 2
MW-5	0.6393	n/a	10/17/2017	0.47	No	16	0	No	0.002505	Param Inter 1 of 2
MW-3	410	n/a	10/17/2017	2600	Yes	16	0	n/a	0.008129	NP Inter (normality) ...
MW-4	410	n/a	10/17/2017	14000	Yes	16	0	n/a	0.008129	NP Inter (normality) ...
MW-5	410	n/a	10/17/2017	2000	Yes	16	0	n/a	0.008129	NP Inter (normality) ...
MW-3	1600	n/a	10/17/2017	13000	Yes	16	0	n/a	0.008129	NP Inter (normality) ...
MW-4	1600	n/a	10/17/2017	41000	Yes	16	0	n/a	0.008129	NP Inter (normality) ...
MW-5	1600	n/a	10/17/2017	9500	Yes	16	0	n/a	0.008129	NP Inter (normality) ...

Note: Prediction Limits based on combined observations  
from Background Wells MW-1 and MW-2